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June 7, 2011

**VIA ECF**

The Honorable Brian M. Cogan  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
New York, NY 11201

**Re: United States v. Thomas Gioeli, et al.  
Case No. 08-cr-240 (S6) (BMC) (RER)**

Dear Judge Cogan:

I am counsel, along with Carl J. Herman, Esq., for defendant Thomas Gioeli in connection with the above matter. I am writing to request an extension of time for filing post-trial motions. I apologize for the late filing of this request, but believed the extension filed by co-defendant Dino Saracino (ECF No. 1510) would cover both defendants. The resulting Order appeared to grant an extension to only Saracino.

On May 9, 2012 (the date of conviction), this Court granted 30 days to file moving papers on behalf of the defendants. After the two-month trial, I have faced the substantial task of catching up on other pending matters in my firm, including planning travel to Europe on another CJA case. In addition, I was ill all of last week with rubella and unable to work. I therefore have not been able to devote sufficient time to preparing proper moving papers on behalf of my client. I request that Gioeli also be given until June 30, 2012 to file moving papers on behalf of his post trial Rule 29 & 33 motions.

The Honorable Brian M. Cogan  
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I thank you in advance for your consideration in this matter.

Respectfully submitted,



Adam D. Perlmutter

Cc: Thomas Gioeli (via regular mail)  
All counsel (via ECF)